
**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

\$73,000.00 U.S. CURRENCY,

Plaintiff/Petitioner,

v.

UNITED STATES OF AMERICA,

Defendant.

**PETITION FOR THE
RETURN OF \$73,000.00 OF
U.S. CURRENCY**

Dkt. No. _____

PETITION FOR THE RETURN OF \$73,000.00 OF U.S. CURRENCY

AND NOW, comes the Petitioner, Cordell R. Collins, by and through his counsel, Thomas A. Will, Esquire and Thomas A. Will & Associates, and respectfully files this Petition for the Return of \$73,000.00 of U.S. Currency and alleges the following:

1. Petitioner, Cordell R. Collins is a resident of Pittsburgh, Allegheny County, Pennsylvania.
2. On or about November 18, 2015, the Drug Enforcement Administration (“DEA”) seized \$73,000.00 of U.S. Currency from Petitioner at the Pittsburgh International Airport.
3. On or about December 9, 2015, subsequent to the seizure, the DEA notified Petitioner of their intention to forfeit the currency pursuant to federal law.
4. According to the Notice, the DEA seized the funds for forfeiture pursuant to 21 U.S.C. § 881.
5. Section 881 provides that all moneys utilized for the purchase of controlled substances or the proceeds of the sale of controlled substances shall be subject to forfeiture. 21 U.S.C. § 811(a)(6).

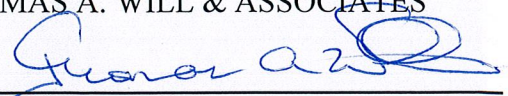
6. Petitioner operates Rock Around the World Entertainment, an entertainment promotion business. Petitioner generates substantial revenues and net profits from Rock Around the World Entertainment. The Petitioner receives the majority of his revenue and pays the majority of his expenses in U.S. currency.
7. Petitioner also owns two (2) pieces of real property in Allegheny County, Pennsylvania.
8. At the time of seizure, Petitioner was traveling to Los Angeles for a substantial event his business was promoting. The Petitioner possessed the currency subject to forfeiture for the purpose of paying expenses associated with the event. These expenses include producers, videographers, radio campaigns, and marketing.
9. Petitioner obtained the currency subject to forfeiture through the operation of his promotion business.
10. Petitioner had a Los Angeles rental property due to the frequency of his business visits to Los Angeles.
11. At the time of this Petition, the DEA has failed to provide any evidence tracing the currency subject to forfeiture to the proceeds from the sale of controlled substances or from the purchase of controlled substances.

WHEREFORE, the Claimant, Cordell R. Collins, respectfully requests that this Honorable Court return the \$73,000.00 of U.S. Currency to the Petitioner as the currency was the proceeds of legitimate business activity and Petitioner planned to utilize the currency for a legitimate business purpose.

Dated: _____

1/8/2016

THOMAS A. WILL & ASSOCIATES


Thomas A. Will, Esquire Pa. I.D. No. 79842
One Gateway Center, Suite 700
420 Ft. Duquesne Blvd.
Pittsburgh, PA 15222
(412) 281-5110
twill@thomasawill.com

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

\$73,000.00 U.S. CURRENCY,

Plaintiff/Petitioner,

v.

UNITED STATES OF AMERICA,

Defendant.

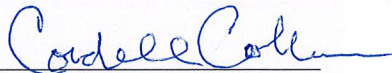
**PETITION FOR THE
RETURN OF \$73,000.00 OF
U.S. CURRENCY**

Dkt. No. _____

VERIFICATION

I declare under oath and under penalty of perjury that the foregoing statements set forth in the attached Petition are true and correct pursuant to 28 U.S. Code §1746.

Executed on: _____


Cordell R. Collins